

IN THE UNITED STATE DISTRICT COURT FOR THE NORTHER DISTRICT OF ILLINOIS

Name of first plaintiff in this case et al

Bobby Lee Harrison ----- other plaintiffs to be added

Case #: 08c 0920

08c0920

- VS -

Judge name: Kennelly

County of Cook A Municipal Corporation

Name of First defendant and Thomas Dart:

Sheriff of the Cook County Jail

Salvador Godinez, Executive director, of the Cook County Jail

Chester Plaxico, Superintendent of the div. 10 &amp; 2.

Original MAR 11 2008

FILED

MAR 11 2008 new

MOTION FOR CERTIFICATION FOR CLASSMICHAEL W. BOBBINS  
CLERK, U.S. DISTRICT COURT

Now Comes plaintiff Bobby Lee Harrison, prose, in this case and respectfully moves this Honorable Court pursuant to Rule 23 to certify case 08c 0920 for a Class (a). To add detainee Lovdell Roberson, & Brian Buchanan, to be a part of the representative parties, for the Class-action. In support of his motion plaintiff, alleges:

That the jail officials had disregarded the deprivation unsanitary living condition unconstitutional lock-down, unconstitutional conduct of staff and failed to adequately investigate and discover and correct such unconstitutional conduct, which caused a violation of pretrial detainees constitutional rights. The Cook County Jail officials knew about pattern abuse, deprivation, unconstitutional violations, but failed to take adequate measure to stop the abuse or to investigate to correct the matter. The jail personnel had violated their duties under the U.S. Constitutional and detainee rights under the Constitutional act with deliberate indifference in creating a condition that violation pretrial detainees' Fourteenth Amendment. The Class is composed of all individuals who are currently incarcerated or will be incarcerated during the pendency of the lawsuit in the Cook County Jail housed in division 10 medical & psychiatric Teirs, which now included the <sup>half</sup> ~~whole~~ division 10 had been converted into a medical & psychiatric ward. Approximately 100.00 hundred detainees housed in division 10. These people have been subject to the deprivations and will in the future be subjected to these violation.

That the Class is so numerous that joinder of all members is impracticable, and the representative parties will fairly and adequately protect the interests of the Class-action. The Superintendent said soon the whole division 10 will be converted into a medical & psychiatric Teirs. On information and belief, the whole division 10 will soon be converted into a medical & psychiatric Teirs

WHEREFORE Plaintiff Bobby Lee Harrison, pray that this Honorable Court Under Rule 23 (a) will grant this motion for Class Certification, in regards to the administration of fair and impartial justice for the plaintiffs in the State of Illinois, Northern District, and County of Cook.

First plaintiff Bobby Lee Harrison

ID 20040072892

Lovdell Roberson

20060075947

Brian Buchanan

20060044242